

*Chris Johnson*

On May 12, 1989, Christopher Johnson and Anthony Payne conducted a routine inspection of Diversey Wyandotte Corporation (Diversey) located at 3921 Dice Road in Santa Fe Springs, California. The purpose of the inspection was to insure Diversey's compliance with all applicable laws governing the handling, storage, and disposal of hazardous wastes.

Upon arriving at Diversey at approximately 8:30 a.m. Johnson and Payne were introduced to Richard F. Galle, the plant manager at the Santa Fe Springs address. Mr. Galle escorted us to his office where the purpose of the visit was discussed. Mr. Galle informed us that Diversey manufactures cleaning agents primarily for industrial usage. Mr. Johnson asked Mr. Galle what hazardous wastes were commonly generated by Diversey. Mr. Galle stated that Diversey does not generate a large quantity of hazardous wastes. Most of the waste material that is generated by Diversey is placed into a holding sump, neutralized and released to the sewer. Any wastes which cannot be released to the sewer are drummed and hauled away as hazardous waste by licensed transporters. Mr. Galle was asked for copies of the last three analyses of Diversey's industrial waste water effluent. Mr. Galle stated he did not know where these were and that he would have to provide them to us at a later date.

Mr. Galle then escorted Mr. Johnson and Mr. Payne into the production area and provided a brief description of the manufacturing process. Mr. Galle stated that raw materials are added to mix tanks to create a final product. The majority of wastes are generated from the tank washouts which occur as a result of product changeover. However, wastes are also generated as a result of spillage, contamination of product, or left over materials resulting from discontinued processes. Diversey has two main mix areas, a "Powder Mix Area" and a "Liquid Mix Area". In the Liquid Mix Area, located on the south side of the building, Mr. Johnson and Mr. Payne observed extensive etching of the floor in the areas leading from the mix tanks down to the center of the room and a substantial flow of liquid on the floor. Mr. Galle stated that these materials leak to the ground as a result of poor connections between the fill lines and the tanks. Mr. Johnson asked Mr. Galle why there wasn't sufficient berming around the mix areas to prevent employee contact with the wastes on the floor. Mr. Galle stated that the company was aware of the lack of sufficient containment and had plans to install a proper drainage system. Mr. Johnson asked Mr. Galle where the drain at the east corner of the room led to. Mr. Galle stated that this drain led into the sump. Mr. Galle then escorted Mr. Johnson and Mr. Payne into the southeastern part of the yard where the holding sump and clarifier system is located.

To the west of the sump and clarifier a large amount of drums and some above ground storage tunnels were observed. At the time of the inspection, the majority of materials/wastes were stored in above ground storage tanks (both fixed and portable) and 55-gallon drums (numerous smaller containers were also present.) The materials/wastes stored in the yard ranged from acids to bases to solvents to oxidizers to generally toxic chemicals. Most of the drums did not meet the labeling requirements of California Code of Regulation, Title 26, Section 66508 (CCR26) making it impossible to identify many of the materials stored on-site at the time of the inspection. Some of the drums on-site were leaking, open to the environment, or in poor condition. Mr. Johnson and Mr. Payne observed large pools of liquid and sludge on the ground interdispersed among the drums stored along the south fence. This area of the yard is paved with asphalt, however, we observed many areas where there was severe surface deterioration. Although there were clearly chemical wastes on the ground, Mr. Galle stated that much of the pooling was caused by the city sprinkler system. Mr. Johnson and Mr. Payne observed a red material leaking on the ground from a pipe leading from one of the ignitable liquid, bulk storage tanks. The area under the tanks was not paved and the tanks were surrounded by a dirt berm. Mr. Galle stated that the leaking red material was a kerosine based oil.

Mr. Johnson asked Mr. Galle how many of the drums stored in the south yard were product, how many were raw material, and how many were hazardous wastes. Mr. Galle stated that he was unsure, but felt that most of the drums were either product or raw material and that very few were wastes. Mr. Johnson asked Mr. Galle whose responsibility it was to maintain the yard. He stated that he was currently responsible for the yard. Mr. Galle stated that he had inherited the yard in its present condition from the prior plant manager who had not addressed the problem. On the west side of the yard

Mr. Johnson and Mr. Payne observed a similar situation to that on the south side of the yard. In general, we observed a large quantity of containers which were in poor condition. Mr. Galle then escorted Mr. Johnson and Mr. Payne to the north side of the yard where there is a large unpaved open area about 3-8 feet below the paved yard's surface. There is an apparent drainage route from the yard to the pit.

Mr. Johnson and Mr. Payne accompanied Mr. Galle back to his office and reviewed the findings of the inspection. Mr. Johnson issued Diversey Wyandotte an Official Notice of Violation which required the company to immediately discontinue the disposal of hazardous wastes to the ground; to legally remove and dispose of all stored hazardous wastes and contaminated materials; to provide a contingency plan and employee training plan;

to submit a copy of all receipts and manifests used to dispose of all hazardous wastes and contaminated materials; to discontinue the storage of hazardous wastes for longer than 90 days; to store all hazardous wastes in compatible containers which are closed and in good condition; to properly label all drums according to applicable laws and regulations; to provide a site assessment and mitigation plan for the contamination at the facility. Mr. Johnson asked Mr. Galle to provide a copy of Diversey Wyandotte's last three industrial waste discharge analysis, any results of previous soil borings which had been conducted on-site, and a copy of the company's plan to contain the waste run off in their liquid mix room.

Mr. Johnson and Mr. Payne then reviewed the Notice of Violation with Mr. Galle to insure that he understood the violations and was aware of the time allotted for him to bring the company into compliance. Mr. Johnson and Mr. Payne left the site at approximately 10:15 a.m..